

# **EXHIBIT B**

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SHAWN DRUMGOLD,  
Plaintiff

C.A. NO. 04-11193NG

v

TIMOTHY CALLAHAN, ET AL.  
Defendant(s)

**PLAINTIFF, SHAWN DRUMGOLD'S SECOND REQUEST FOR PRODUCTION OF  
DOCUMENTS TO THE DEFENDANT, THE CITY OF BOSTON**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the Local Rules of this Court, Plaintiff, Shawn Drumgold, hereby requests that Defendant, the City of Boston, produce for inspection and copying the documents requested below at the offices of Tommasino & Tommasino, 2 Center Plaza, 8<sup>th</sup> Floor, Boston, MA 02108, within thirty (30) days after service hereof. These documents requests are continuing. If at any time after service of these answers hereto, and prior to the trial of this action, Defendant, the City of Boston, obtains or becomes aware of additional information pertaining to any of these requests, the disclosure of which may be required pursuant to the Federal Rules of Civil Procedures Defendant, the City of Boston, shall serve upon the undersigned supplemental sworn written answers setting forth such additional information.

1. All records which record the current home addresses of former Boston Police Officers:

Joseph Dunford

Willis Saundes

John Daley

Paul McDonough

Lt. Neely (former commander of the homicide unit)

Respectfully submitted,  
Plaintiff Shawn Drumgold,  
By his attorney,



Rosemary Curran Scapicchio, Esq.  
Four Longfellow Place  
Suite #3703  
Boston, MA 02114  
(617) 263 7400  
BBO#558312

Respectfully submitted  
Plaintiff Shawn Drumgold,  
by his attorney,



Michael W. Reilly, Esq.  
Tommasino & Tommasino  
2 Center Plaza  
Boston, MA 02108  
(617) 723-1720  
BBO#415900

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the  
above document was served upon the  
attorney of record for each other party  
by mail/hand on 9/20/07

